

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

Gregory Boyer, as Administrator of the
Estate of Christine Boyer, and on his own
behalf,

20-cv-1123 jdp

Plaintiff,

vs.

Advanced Correctional Healthcare, Inc.,
Lisa Pisney, Amber Fennigkoh, Stan
Hendrickson, Danielle Warren, Shasta
Parker, and Monroe County, Wisconsin

Defendants.

Gregory Boyer, as Administrator of the
Estate of Christine Boyer, and on his own
behalf,

22-cv-723 jdp

Plaintiff,

vs.

USA Medical & Psychological Staffing,
S.C., Norman Johnson, Travis Schamber,
Wesley Harmston, and Jillian Bresnahan,

Defendants.

**AFFIDAVIT OF JOHN B. CASSERLY IN SUPPORT OF MOTION
FOR PARTIAL SUMMARY JUDGMENT OF
DEFENDANTS USA MEDICAL & PSYCHOLOGICAL STAFFING, S.C.,
NORMAN JOHNSON, M.D., AND TRAVIS SCHAMBER, D.O.**

STATE OF MINNESOTA)
) ss
COUNTY OF RAMSEY)

I, John B. Casserly, being first duly sworn, do swear and affirm:

1. That I am one of the attorneys of record for Defendants USA Medical & Psychological Staffing, S.C., Norman Johnson, M.D., and Travis Schamber, D.O.
2. Attached as Exhibit 1 is a true and correct copy of Defendants USA Medical & Psychological Staffing, S.C., Norman Johnson, Travis Schamber, Wesley Harmston and Jillian Bresnahan's Interrogatories to Plaintiff, served February 6, 2024 and to which no Answer was served.
3. Attached as Exhibit 2 is a true and correct copy of Defendants USA Medical & Psychological Staffing, S.C., Norman Johnson, Travis Schamber, Wesley Harmston and Jillian Bresnahan's Requests for Production of Documents and things to Plaintiff, served February 6, 2024 and to which no Response was served.
4. Attached as Exhibit 3 is a true and correct copy of the Articles of Incorporation of USA Medical Staffing & Psychological Staffing, S.C.
5. Attached as Exhibit 4 is a true and correct copy of the Bylaws of USA Medical Staffing & Psychological Staffing, S.C.
6. Attached as Exhibit 5 is a true and correct copy of the State of Wisconsin Department of Institutions Endorsement of USA Medical Staffing & Psychological Staffing, S.C.
7. Attached as Exhibit 6 is a true and correct copy of the 2021 and 2023 Annual Meeting of Shareholders of USA Medical Staffing & Psychological Staffing, S.C.

8. Attached as Exhibit 7 is a true and correct copy of the 2021 and 2023 Annual Meeting of Directors of USA Medical Staffing & Psychological Staffing, S.C.

9. Attached as Exhibit 8 is a true and correct copy of Defendant Advanced Correctional Healthcare, Inc.'s Responses to Plaintiff's Rule 34 Requests Dated September 5, 2023.

10. Attached as Exhibit 9 is a true and correct copy of the Articles of Incorporation of Advanced Correctional Healthcare, Inc.

11. Attached as Exhibit 10 is a true and correct copy of the Second Amended and Restated By-laws of Advanced Correctional Healthcare, Inc. dated July 1, 2010.

12. Attached as Exhibit 11 is a true and correct copy of the Revised Article IV of the Second Amended and Restated By-laws of Advanced Correctional Healthcare, Inc. as of April 1, 2012.

13. Attached as Exhibit 12 is a true and correct copy of the Organizational Action by Written Consent of the Shareholders of Advanced Correctional Healthcare, Inc.

14. Attached as Exhibit 13 is a true and correct copy of the Organizational Action by Written Consent of the Directors of Advanced Correctional Healthcare, Inc.

15. Attached as Exhibit 14 is a true and correct copy of the Written Consent of the Shareholders of Advanced Correctional Healthcare, Inc. in Lieu of the 2019 Annual Meeting.

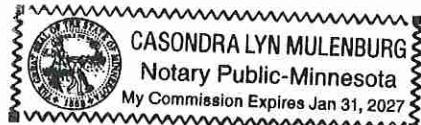
16. Attached as Exhibit 15 is a true and correct copy of the Written Consent of the Board of Directors of Advanced Correctional Healthcare, Inc. in Lieu of the 2019 Annual Meeting.

17. Attached as Exhibit 16 is a true and correct copy of Plaintiff's Rule 26(a)(2) Disclosures.

18. Attached as Exhibit 17 is a true and correct copy of Defendants USA Medical & Psychological Staffing, S.C., Norman Johnson, M.D., Travis Schamber, D.O., Wesley Harmston, and Jillian Bresnahan's Rule 26(a)(2) Disclosures.

SUBSCRIBED and SWORN to before
me this 14th day of February, 2025

Cassandra Mullenburg
Notary Public



John B. Casserly
John B. Casserly